

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Stephanie Garabedian, Esq.
5 Nevada Bar No. 9612
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 sgarabedian@wrightlegal.net
11 *Attorneys for Defendant, Hartford*
12 *Insurance Company of the Midwest*

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 KITA HURVITZ, individually,
16
17 Plaintiff,
18
19 vs.

20 HARTFORD INSURANCE COMPANY OF
21 THE MIDWEST, HARTFORD CASUALTY
22 INSURANCE COMPANY, THE
23 HARTFORD FINANCIAL SERVICES
24 GROUP, INC., and DOES I through X
25 inclusive, and ROE CORPORATIONS I
26 thought X, inclusive,

27 Defendants.

28 HARTFORD INSURANCE COMPANY OF
THE MIDWEST,

Counterclaimant,

vs.

KITA HURVITZ,

Counter-Defendant.

Case No.: 2:21-cv-00617-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR PLAINTIFF
TO RESPOND TO DEFENDANT'S
LIMITED OPPOSITION TO
PLAINTIFF'S MOTION FOR 90-DAY
EXTENSION TO STAY [ECF NO. 47]**

(First Request)

Pro Se Plaintiff/Counter-Defendant Kita Hurvitz (**Plaintiff**), and
Defendant/Counterclaimant, Hartford Insurance Company of the Midwest (**Hartford**) by and
through its Counsel, (collectively, the **Parties**) and pursuant to Local Rule IA 6-1 and 6-2, hereby
jointly stipulate to a twenty-five (25) day extension of time for Plaintiff to respond to Hartford's

Limited Opposition filed on January 26, 2023 [ECF No. 47], and state as follows:

1. Plaintiff filed her Motion for 90 Day Extension of Stay on January 12, 2023. [ECF No. 45].
2. On January 26, 2023, Hartford filed its Limited Opposition to Plaintiff's Motion for 90 Day Extension of Stay ("Limited Opposition"). The Limited Opposition was served upon Plaintiff via First Class mail to 827 Spyglass Lane, Las Vegas, Nevada 89107. *See* Certificate of Service attached to ECF No. 47.
3. The Limited Opposition was subsequently returned to Hartford's Counsel with a stamp from the Post Office stating, "Return to Sender. Attempted – Not Known. Unable to Forward." Hartford did not have another mailing address for Plaintiff to serve the Limited Opposition. ECF No. 44.
4. Plaintiff did not receive a copy of Hartford's Limited Opposition until March 23, 2023 when she presented herself to the Court's Clerk.
5. Pursuant to LR 7-2, the deadline for Plaintiff to reply to Hartford's Limited Opposition is 14 days after the date of service of the response.
6. The deadline for Plaintiff to file a Reply is April 6, 2023 based upon the date of Plaintiff's receipt of the Limited Opposition of March 23, 2023.
7. Plaintiff has requested additional time to respond to the Limited Opposition given her pro-se representation and ongoing health issues.
8. Pursuant to Fed. R. Civ. Pro. 6 (b), the Court may enlarge the time for Plaintiff to respond to the Limited Opposition for good cause if the deadline to respond has not expired.
9. The deadline for Plaintiff to respond has not passed based upon the actual service date of the Limited Opposition.
10. The Parties submit there is good cause to extend the time to allow Plaintiff to file a Reply to the Limited Opposition based upon the service issues, Plaintiff's pro-se representation and her ongoing health issues.
11. The new deadline for Plaintiff to respond to Limited Opposition would be May 1,

2023.

12. This is the first stipulation for an extension of time to respond to a pending Motion.

This extension is sought in good faith and not for purposes of delay, and no deadlines will be affected by this extension.

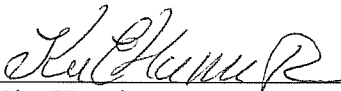
13. WHEREFORE, the Parties respectfully request that the Court enter this order extending Plaintiff's deadline to respond to the Limited Opposition to May 1, 2023 and provide such other relief as is just and proper.

IT IS SO STIPULATED.

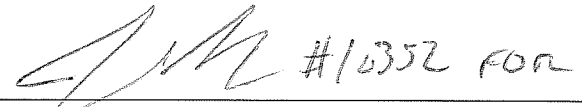
DATED this 30 day of March, 2023.

DATED this 30th day of March, 2023.

WRIGHT, FINLAY & ZAK, LLP



Kita Hurvitz
827 Spyglass Lane
Las Vegas, Nevada 89107
Plaintiff/Counter-Defendant in Pro Se

 #16352 for

Darren Brenner, Esq.
Nevada Bar No. 8386
Stephanie Garabedian, Esq.
Nevada Bar No. 9612
7785 W. Sahara Ave., Suite 200
Las Vegas, NV 89117
*Attorneys for Defendant/Counter-Claimant,
Hartford Insurance Company of the
Midwest*

IT IS SO ORDERED.

Dated this 11th day of April, 2023.


RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this